

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

CHRISTOPHER META )  
Plaintiff, ) CASE NO. 4:14-cv-0832  
v. ) JUDGE DONALD V. NUGENT  
TARGET CORP., et al., )  
Defendants. )

AFFIDAVIT OF ERICH NEUMANN

STATE OF FLORIDA )  
MIAMI-DATE COUNTY )

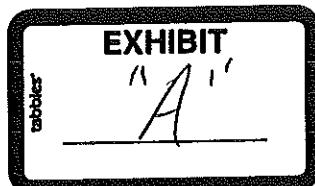
Personally before me, an officer duly authorized by law to administer oaths, appeared Erich Neumann, who after being duly sworn did depose and state under oath as follows:

1. My name is Erich Neumann, and I am a Class Member who is objecting to the settlement in the above-captioned case. I am over the age of eighteen (18) and am competent to give this affidavit. The facts stated herein are facts of my own personal knowledge.

2. I am not a "serial objector" and I make the objection to the above-captioned case in good faith.

3. I have objected to only four other class actions. In each of those, I was a class member, wherein my membership in the Class was determined by the defendants' own business records.

4. I have been a class member in many more class actions (far more than those to which I have objected) wherein I received both direct and indirect notice, but did *not* object as I believed those settlement were fair.



5. In this case, I am particularly offended by a class action where the attorneys will make far more than the class members themselves, even though Target is a huge company with a \$45 billion market cap. I believe the settlement was structured in a way to conceal the settlement value from the Court, and to ensure that the overwhelming majority of settlement funds were siphoned to Class Counsel.

6. With respect to the bond, I do not have the ability to post a \$40,000 bond in this case, or any bond in excess of a nominal amount.

7. I am married with an infant child, and my family and I live in a modest 985 square foot 1BR / 1.5BA condominium unit. It is the only property I own.

8. My source of income is my small solo legal practice in Miami Beach, Florida. Currently, the operations account for that business contains approximately \$1,200. Last year, my income from the firm was less than \$60,000, and currently I do not foresee any increased income this year.

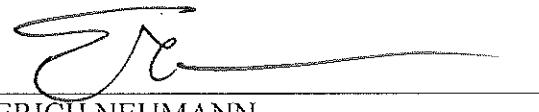
9. My personal banking account has a negative balance.

10. My debts are considerable. While I have approximately \$8,000 in a money market savings account, I have over \$45,000 in student loan debt.

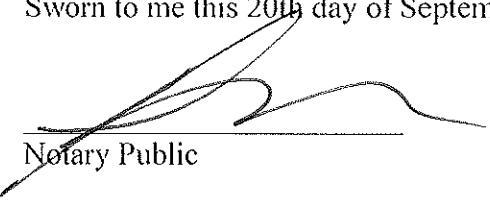
11. More recently, my condominium association issued a special assessment in which I was to pay \$6,606. I was unable to pay the amount owed on the due date, and have had to work out a monthly payment plan with the association. This has created a financial hardship.

12. The imposition of a \$40,000 bond, or any bond above a nominal amount, would effectively preclude my ability to pursue the appeal at issue in this case.

FURTHER AFFIANT SAYETH NOT.

  
ERICH NEUMANN

Sworn to me this 20th day of September, 2018.

  
Notary Public

My commission expires:

